

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Rodriguez, et al. v. The Islamic Republic of Iran</i>	18-cv-12347 (GBD)(SN) ECF Case

**MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT JUDGMENT AGAINST
THE ISLAMIC REPUBLIC OF IRAN AS TO LIABILITY AND DAMAGES**

PLEASE TAKE NOTICE that upon the accompanying declaration of Robert Keith Morgan with exhibits, and the accompanying memorandum of law, and in accordance with this Court's November 14, 2023 Order setting forth such information as is required by the Court to adjudicate this motion (See ECF No. 9425), the Plaintiff identified in Exhibit A to the declaration of Robert Keith Morgan, respectfully moves this Court for an Order of judgment by default against the Defendant, Islamic Republic of Iran ("Iran"), under 28 U.S.C. § 1605A(c).¹ The Plaintiff herein is seeking pain and suffering damages in accordance with this Court's prior orders and based on those awarded in prior judgments entered by this Court in this litigation, specifically, *Havish v. bin Laden* (ECF No. 2618), and *Hoglan v. The Islamic Republic of Iran* (ECF No. 3363). Plaintiff also seeks pre-judgment interest at rate of 4.96 percent per annum, compounded annually from the period from September 11, 2001, until the date of the judgment.

Rosa Jimenez as personal representative of the Estate of Luis Jimenez, Jr., a national of the United States killed in the terrorist attacks on September 11, 2001, moves for pain and suffering damages in the amount of \$ 2,000,000. Estate Plaintiff also seeks leave of Court to submit future motions asserting economic damages.

Further, Plaintiff moves that any pain and suffering damages awarded herein include prejudgment interest at the rate of 4.96 percent per annum, compounded annually from the period

¹ All ECF Nos. refer to the main MDL docket, 03-md-01570, unless otherwise indicated.

from September 11, 2001, until the date of judgment. Plaintiff also moves for permission to seek punitive damages in the future and for all other *Rodriguez* Plaintiffs not appearing on Exhibit A, to submit applications for damage awards in later stages of this litigation, to the extent such awards have not been previously addressed by the Court.

Dated: January 27, 2025

Respectfully submitted,

/s/ Robert Keith Morgan

Robert Keith Morgan

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